

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

- v. -

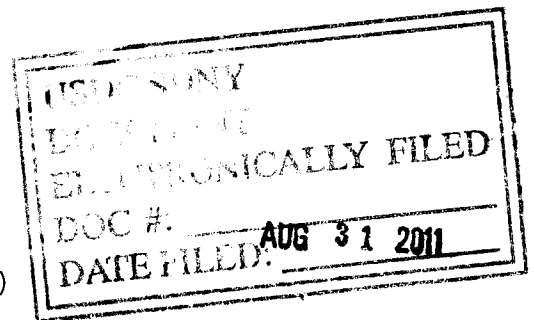
CHRISTOPHER MICHAEL COKE,
a/k/a "Michael Christopher Coke," :
a/k/a "Paul Christopher Scott," :
a/k/a "Presi," :
a/k/a "General," :
a/k/a "President," :
a/k/a "Duddus," :
a/k/a "Shortman," :

Defendant. :

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SUPERSEDING INFORMATION

S17 07 Cr. 971 (RPP)



COUNT ONE

(Racketeering Conspiracy)

The United States Attorney charges:

The Enterprise

1. At all times relevant to this Information,

CHRISTOPHER MICHAEL COKE, a/k/a "Michael Christopher Coke," a/k/a "Paul Christopher Scott," a/k/a "Presi," a/k/a "General," a/k/a "President," a/k/a "Duddus," a/k/a "Shortman," the defendant, was the leader of an organization known as the "Shower Posse" and also as the "Presidential Click" (the "Presidential Click"). The Presidential Click is a criminal organization based in Tivoli Gardens, a garrison community in Kingston, Jamaica, with a presence in other areas of Jamaica, and in other countries, including the United States. Members of the Presidential Click

have engaged in numerous criminal acts, including narcotics trafficking, firearms trafficking and assault.

2. The Presidential Click, including its leadership, membership, and associates, constituted an "enterprise," as that term is defined in Title 18, United States Code, Sections 1959(b)(2) and 1961(4) - that is, a group of individuals associated in fact, which was engaged in, and the activities of which affected, interstate and foreign commerce. The Presidential Click was an organized criminal group based in Kingston, Jamaica, that operated in the Southern District of New York and elsewhere and constituted an ongoing organization whose members functioned as a continuing unit for a common purpose of achieving the objectives of the enterprise.

The Defendant

3. At all times relevant to this Information, CHRISTOPHER MICHAEL COKE, a/k/a "Michael Christopher Coke," a/k/a "Paul Christopher Scott," a/k/a "Presi," a/k/a "General," a/k/a "President," a/k/a "Duddus," a/k/a "Shortman," the defendant, was the leader of the Presidential Click and participated in the commission of various crimes, including, among other things, narcotics trafficking, firearms trafficking, and assault.

Means And Methods of the Enterprise

4. Among the means and methods by which CHRISTOPHER MICHAEL COKE, a/k/a "Michael Christopher Coke," a/k/a "Paul

Christopher Scott," a/k/a "Presi," a/k/a "General," a/k/a "President," a/k/a "Duddus," a/k/a "Shortman," the defendant, and others conducted and participated in the conduct of the affairs of the enterprise were the following:

a. Since in or about the early 1990s, COKE has controlled the Tivoli Gardens area, a neighborhood in inner-city Kingston, Jamaica. Tivoli Gardens is a garrison community, a barricaded neighborhood guarded by a group of armed gunmen. These gunmen act at COKE's direction. COKE arms them with firearms he imports illegally, via a wharf located adjacent to Tivoli Gardens. COKE also distributes firearms to other area leaders of other sections of Kingston, Jamaica.

b. The members of the Presidential Click reside in Tivoli Gardens, other areas of Jamaica, and in other countries, including the United States. From at least in or about 1994, members of the Presidential Click have been involved in drug trafficking in New York City, Miami, and Kingston, Jamaica, as well as other locations. The Presidential Click members have distributed narcotics, including marijuana, cocaine and crack cocaine, at COKE's direction and on his behalf. They have then sent the proceeds of the drug sales to COKE in Jamaica, in the form of cash and/or goods. The Presidential Click members rely on COKE to assist them in their drug businesses here in the United States and in other countries. Because of COKE's

international power and influence, COKE is able to provide protection to Presidential Click members involved in drug trafficking and other illegal activities, in the United States and elsewhere. The Presidential Click members in the United States routinely seek COKE's advice and approval for various matters relating to the sales of narcotics, including how to resolve conflicts with other Presidential Click members. The members of the Presidential Click commonly send cash and goods, including clothing and electronics, to COKE as "tribute" payments, in recognition of his leadership and his assistance.

c. In addition to providing COKE with a portion of the proceeds from their drug trafficking activities, and "tribute" payments, members of the Presidential Click in the United States supply COKE with firearms in exchange for the assistance that COKE provides, and in recognition of his status and power within the Presidential Click. Presidential Click members purchase firearms in the United States and ship those firearms to Jamaica. Once those firearms arrive in Jamaica, COKE decides how and to whom they will be distributed. COKE's access to firearms, as well as cash, serves to support and increase his authority and power in Kingston, Jamaica and elsewhere.

The Racketeering Conspiracy

5. From at least in or about 1999, up through and including in or about June 2010, in the Southern District of New

York and elsewhere, CHRISTOPHER MICHAEL COKE, a/k/a "Michael Christopher Coke," a/k/a "Paul Christopher Scott," a/k/a "Presi," a/k/a "General," a/k/a "President," a/k/a "Duddus," a/k/a "Shortman," the defendant, and others known and unknown, being persons employed by and associated with the racketeering enterprise described in Paragraphs 1 through 4 above, namely, the Presidential Click, which enterprise was engaged in, and the activities of which affected, interstate and foreign commerce, unlawfully, willfully, and knowingly combined, conspired, confederated, and agreed together and with each other to violate 18 U.S.C. § 1962(c), to wit, to conduct and participate, directly and indirectly, in the conduct of the affairs of that enterprise through a pattern of racketeering activity, as that term is defined in Title 18, United States Code, Sections 1961(1) and 1961(5), and as set forth below in paragraph 6. COKE agreed a conspirator would commit at least two acts of racketeering activity in the conduct of the affairs of the enterprise.

The Pattern of Racketeering

6. The pattern of racketeering activity, as defined in Title 18, United States Code, Sections 1961(1) and 1961(5), through which CHRISTOPHER MICHAEL COKE, a/k/a "Michael Christopher Coke," a/k/a "Paul Christopher Scott," a/k/a "Presi," a/k/a "General," a/k/a "President," a/k/a "Duddus," a/k/a "Shortman," the defendant, and his co-conspirators agreed to

conduct and participate in the conduct of the affairs of the enterprise, consisted of multiple acts involving distributing, and possessing with intent to distribute, controlled substances, including marijuana, cocaine and crack cocaine, in violation of Title 21, United States Code, Sections 812, 841, and 846.

(Title 18, United States Code, Section 1962(d).)

COUNT TWO

(Conspiracy to Commit Assault
in Aid of Racketeering)

The United States Attorney further charges:

7. Paragraphs 1 through 4 of this Information are repeated, realleged, and incorporated by reference as though set forth fully herein.

8. The Presidential Click enterprise, through its members and associates, engaged in racketeering activity that consisted of multiple acts involving distributing, and possessing with intent to distribute, controlled substances, including marijuana, cocaine and crack cocaine, in violation of Title 21, United States Code, Sections 812, 841, and 846.

9. In or around May 2007, in the Southern District of New York and elsewhere, CHRISTOPHER MICHAEL COKE, a/k/a "Michael Christopher Coke," a/k/a "Paul Christopher Scott," a/k/a "Presi," a/k/a "General," a/k/a "President," a/k/a "Duddus," a/k/a "Shortman," the defendant, and others known and unknown, did unlawfully, willfully, and knowingly combine, conspire,

confederate, and agree together and with each other to commit an assault against a narcotics trafficker with a dangerous weapon, in connection with that narcotics trafficker's failure to pay a drug debt owed to another member of the Presidential Click, for the purpose of maintaining and increasing position in the Presidential Click, an enterprise engaged in racketeering activity, and in violation of New York State Penal Law, Sections 120.10 and 120.05.

(Title 18, United States Code, Sections 1959(a)(6) and 2.)

RICO FORFEITURE ALLEGATION RELATING TO COUNT ONE

10. The allegations contained in Count One of this Information are hereby repeated, realleged, and incorporated by reference herein as though fully set forth at length for the purpose of alleging forfeiture pursuant to the provisions of Title 18, United States Code, Section 1963 and Title 28, United States Code, Section 2461(c). Pursuant to Rule 32.2, Fed. R. Crim. P., notice is hereby given to the defendant that the United States will seek forfeiture as part of any sentence in accordance with Title 18, United States Code, Section 1963 in the event of the defendant's conviction under Count One of this Information.

11. The defendant, CHRISTOPHER MICHAEL COKE, a/k/a "Michael Christopher Coke," a/k/a "Paul Christopher Scott," a/k/a "Presi," a/k/a "General," a/k/a "President," a/k/a "Duddus," a/k/a "Shortman":

i. has acquired and maintained interests in violation of Title 18, United States Code, Section 1962, which interests are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(1);

ii. has an interest in, security of, claims against, and property and contractual rights which afford a source of influence over, the enterprise named and described herein which the defendant established, operated, controlled, conducted, and participated in the conduct of, in violation of Title 18, United States Code, Section 1962, which interests, securities, claims, and rights are subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963 (a)(2);

iii. has property constituting and derived from proceeds obtained, directly and indirectly, from racketeering activity, in violation of Title 18, United States Code, Section 1962, which property is subject to forfeiture to the United States pursuant to Title 18, United States Code, Section 1963(a)(3).

12. The interests of the defendant CHRISTOPHER MICHAEL COKE, a/k/a "Michael Christopher Coke," a/k/a "Paul Christopher Scott," a/k/a "Presi," a/k/a "General," a/k/a "President," a/k/a "Duddus," a/k/a "Shortman," subject to forfeiture to the United

States pursuant to Title 18, United States Code, Sections 1963(a)(1), (a)(2), and (a)(3), include but are not limited to any and all property constituting and derived from proceeds obtained, directly and indirectly, from racketeering activity, in violation of Title 18, United States Code, Section 1962.

Substitute Asset Provision

13. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

a. cannot be located upon the exercise of due diligence;

b. has been transferred or sold to, or deposited with, a third person;

c. has been placed beyond the jurisdiction of the Court;


d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to Title 18, United States Code, Section 1963(m), to seek forfeiture of any

other property of the defendant up to the value of the above
forfeitable property.

(Title 18, United States Code, Sections 1962 and 1963.)



PREET BHARARA
United States Attorney

(517) 0700971(RPP)

8/31/11 - Defendant Christopher Coke, produced by US Marshals, present with attorneys Doddato & Rosen (by telephone). AVSA's Shauler & Zach present. Defendant appears and waives physical presence of Mr. Rosen. Defendant is then assigned on this information & enters a plea of guilty to both counts. Allocution is conducted, Court accepts plea of guilty to both counts. PR is advised, sentence set for 12/8/11 at 4 PM. The defendant is continued recorded.
Patterson, J. (1 Hr 10 min)